

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC  
d/b/a HENRY HOLT AND COMPANY,

Relief-Defendant.

Case No. 1:19-cv-1197-LO-TCB

**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT AND PERMANENT  
INJUNCTION AGAINST DEFENDANT EDWARD SNOWDEN**

In order to facilitate the conclusion of proceedings before this Court without the need for summary judgment motion practice or trial, the parties hereby jointly request that the Court enter a Final Judgment and Permanent Injunction against Defendant Edward Snowden in the form attached hereto as Exhibit A. In stipulating to the entry of this Final Judgment and Permanent Injunction, the parties do not amicably resolve all of their differences this matter. Instead, the attached form of Final Judgment embodies the parties' agreement as to the relief that flows from the Court's earlier summary judgment ruling on liability, *United States v. Snowden*, No. 1:19-CV-1197, --- F. Supp. 3d ---, 2019 WL 8333546 (E.D. Va. Dec. 17, 2019), and the Court's ruling imposing discovery sanctions pursuant to Fed. R. Civ. P. 37, and thus would likely be granted the United States upon summary judgment motion practice. Accordingly, each party maintains

its respective litigation positions and reserves all rights with regard to the issues of liability presented in the earlier summary judgment filings, ECF Nos. 21-22, 51-52, 58. Defendant Snowden expressly reserves his right to appeal from the Court's December 17, 2019 liability ruling, and if he obtains any favorable ruling on appeal, reserves all rights as to the effect of that ruling on each and every provision of the attached Final Judgment; however, execution of such Judgment shall not be stayed pending any appeal. All rights with regard to the enforcement of such Final Judgment in the future are likewise reserved.

Respectfully Submitted,

DATED: September 18, 2020

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